

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA,  
*Plaintiff*

VERSUS

CATAHOULA PARISH SCHOOL  
BOARD, *et al.*,  
*Defendants*

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CIVIL ACTION NO. 69-14430

JUDGE DRELL

MAG. JUDGE PEREZ-MONTES

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**MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION TO CLOSE  
JONESVILLE JUNIOR HIGH SCHOOL AND TO CHANGE GRADE STRUCTURES  
AT JONESVILLE ELEMENTARY AND BLOCK HIGH SCHOOLS**

**MAY IT PLEASE THE COURT:**

Defendant Catahoula Parish School Board (the “Board”) respectfully submits the following memorandum in support of the instant Motion.

Currently, within the Jonesville attendance zone, students in grades PreK-4 attend Jonesville Elementary School, students in grades 5-7 attend Jonesville Junior High School, and students in grades 8-12 attend Block High School. As of October 1, 2018, Jonesville Elementary School served 263 students (132 W, 127 B), Jonesville Junior High School served 116 students (55 W, 59 B), and Block High School served 190 students (75 W, 111 B).<sup>1</sup> There is sufficient capacity in Jonesville Elementary School to accommodate 5<sup>th</sup> grade students from Jonesville Junior High School and for Block High School to accommodate 6-7<sup>th</sup> grade students from Jonesville Junior High School. As such, the Board would like to discontinue utilization of the Jonesville Junior High School facility and transfer the 5<sup>th</sup> grade to Jonesville Elementary School, which would make it a true elementary school, and the 6-7<sup>th</sup> grades to Block High School. The closure of Jonesville Junior High School and reconfiguration of

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<sup>1</sup> See, Exhibit 3 to 2018 Annual Report, Record Document 26-3 at pp. 1-2.

Jonesville Elementary School and Block High School will not adversely affect the racial demographics of the Jonesville attendance zone schools nor will it impede desegregation of them.<sup>2</sup> Indeed, the closure of Jonesville Junior High School would also give the Board the opportunity to transfer certified teachers from that school to other schools, including Block High School in particular.<sup>3</sup>

The Board continues to face a severe financial crisis. Since 2011, the Board's total student enrollment has dropped from 1560 students to 1223 students.<sup>4</sup> The loss of 337 students (21.6% of all students) in such a small District significantly impacts the Minimum Foundation Program ("MFP") funding the Board receives from the state.<sup>5</sup> Despite the fact that there has been no increase in state assistance for public education for many years, the Board is obligated by state law to operate with a balanced budget. As such, significant cuts in expenditures must be made. The Board projects that the closure of Jonesville Junior High School will result in a savings of approximately \$400,000. This would be a significant savings that the Board cannot afford to ignore.

Accordingly, because capacity exists within Jonesville Elementary School and Block High School so as to permit the closure of Jonesville Junior High and reconfiguration of those schools, and in light of the fact that such closure will not alter the racial demographics of the schools in question or impede the efforts of the school system to desegregate those schools to the extent required by law, the Board respectfully requests that it be authorized to make such closure and reconfiguration beginning with the 2019-2020 school year. The School Board would also show that this motion has been discussed with Ms. Colleen M. Phillips, Esq., counsel for the United States of America, Plaintiff in this matter, and Ms. Phillips has authorized undersigned counsel to indicate to the Court that, with

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<sup>2</sup> The United States has indicated to undersigned counsel that it desires to monitor such closure and reconfiguration to ensure there is no negative impact on desegregation.

<sup>3</sup> The Board maintains, however, that the fact that a teacher is not "certified" does not mean that the teacher is not "qualified." See, e.g., Board's February 26, 2019 Memorandum, Record Document 32, at p. 4.

<sup>4</sup> Compare Exhibit C to 2011 Annual Report, Record Document 9-1 at p. 9, with Exhibit 3 to 2018 Annual Report, Rec. Doc. 26-3 at p. 3.

<sup>5</sup> As explained in the Board's recently filed Memorandum, the loss of 337 students has resulted in a loss of approximately \$3,453,239 (337 students x \$10,247/student) per year of MFP funding. See Rec. Doc. 32 at pp. 2-3.

the understanding that the Board will successfully effectuate the actions specified in the April 18, 2019 written Plan for Closure and Consolidation (copy attached as Exhibit A), the United States does not object to the Board's motion to close Jonesville Junior High School.

**Respectfully submitted**, this the 22<sup>nd</sup> day of May 2019.

**CATAHOULA PARISH SCHOOL BOARD**

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